



STATE OF TENNESSEE  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JOHNSON CITY ENVIRONMENTAL FIELD OFFICE  
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September 27, 2016

The Honorable Dennis Deal, Mayor  
Town of Church Hill  
P.O. Box 366  
Church Hill, Tennessee 37642

RE: **Pretreatment Technical Assistance Visit (TAV)**  
Church Hill STP  
NPDES Permit # TN0021253  
Hawkins County

Honorable Mayor Deal:

Division of Water Resources personnel performed a routine pretreatment Technical Assistance Visit (TAV) of the Church Hill STP pretreatment program on September 8, 2016. The Division of Water Resources would like to thank the personnel at the Town of Church Hill for their time and assistance in completing the inspection. The TAV included follow up on deficiencies noted during the Pretreatment Compliance Inspection (PCI) in August and September 2015, a review of the April 1 through March 31, 2016 pretreatment Semi-Annual Reports, and program operations since the previous inspection. Please find enclosed a copy of the POTW Technical Assistance Visits Checklist for the facility. A file review was conducted of Techni-Glass Corporation's file. The following comments are noted from the inspection:

1. In reviewing the Pretreatment Semiannual Report (SAR) for October 31, 2015 to March 31, 2016, the POTW exceeded the influent criteria for total phenols. The protection criteria limit is 0.11627 mg/l and the reported value was 0.2255 mg/l.
2. The pass through limit for phenols is reported as 0.05 mg/l and the reported analytical result for the effluent was <0.0965 mg/l. in the October 31, 2015 to March 31, 2016 SAR. The method used was not sensitive enough to prove that the pass through limit was met. Church Hill must use an analytical method that is sensitive enough to confirm that the pass through limit is being met.
3. It was reported that 50 non-categorical industries were inspected by the control authority during the 4/1/2015 to 9/30/2015 SAR. This appears to be a

typographical error. Please review and submit a revised Form 7 Pretreatment Performance Summary, if the number is truly a typographical error.

4. The Industrial User permit for Techni-Glass, Inc. does not specify the lead permit limits. The daily lead limit should read 0.8064 mg/l and the monthly average limit should read 0.4032 mg/l.
5. The Industrial User permit for Techni-Glass, Inc. part 2 – Monitoring Requirements, has a notation for a footnote number 5, but footnote 5 is not in the footnotes. Please revise the permit when it is reissued to either include footnote 5 or remove this reference.
6. The Industrial User permit for Techni-Glass, Inc. part 2 – Monitoring Requirements, does not specify where grab samples must be taken. The permit should be revised to state which parameters should be sampled using quarterly grab samples.

Please provide a written response to the numbered deficiencies by October 31, 2016. This response must include proposed corrective actions and implementation schedules, including estimated completion dates, to address each item above. Additionally, revisions to the SARs should be submitted both to this office and our Nashville Central Office. As a reminder, failure to implement and maintain an effective pretreatment program may result in industrial discharges harmful to the sewage collection system, wastewater treatment plant, receiving water, and/or public health.

The Division of Water Resources wishes to thank Church Hill WWTP personnel for their time and courtesy shown during the inspection. If you have any questions concerning this correspondence, please contact me at (423) 854-5457 or Robert.Tipton@tn.gov.

Sincerely,



Robert Tipton  
Environmental Scientist 3  
Tennessee Division of Water Resources  
Johnson City Environmental Field Office

RT/190316271

cc: Ms. Sandy Renner, Church Hill Pretreatment Coordinator, 500 South Allens  
Bridge Road, Greeneville, Tennessee 37743  
Ms. Yatasha Moore, DWR Compliance and Enforcement unit, Nashville (via e-mail-Yatasha.moore@tn.gov)